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Attorneys for Debtors and
Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:
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MOTORS LIQUIDATION COMPANY, <i>et al.</i>,	:
f/k/a General Motors Corp., <i>et al.</i>	:
	:
Debtors.	:
-----X	

**DECLARATION OF HOWARD CHU IN RESPONSE TO THE APPLICATION
OF FEDERAL REPUBLIC OF GERMANY PURSUANT TO RULE 2004 OF THE
FEDERAL RULES OF BANKRUPTCY PROCEDURE**

I, Howard Chu, hereby declare under penalty of perjury:

1. I am the claims manager for General Motors Company. I was formerly employed as the claims manager for General Motors Corporation (n/k/a Motors Liquidation Company) (the “**Debtor**”) before the Debtor sold substantially all of its assets to NGMCO, Inc. (n/k/a General Motors Company) on July 10, 2009. As part of my work I have knowledge of the insurance policies maintained by the Debtor prior to July 10, 2009, and General Motors Company. I am responsible for submitting claims to the insurance carriers maintained by General Motors Company. I submit this declaration

in response to the Application of Federal Republic of Germany Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure. I have personal knowledge of the facts stated herein and I am competent to make this declaration.

2. The Debtor is self-insured with respect to product liability claims with a self-insured retention in the amount of \$35,000,000 per occurrence. Thus, the Debtor would be directly responsible for satisfying any judgment entered in this case up to \$35,000,000, including legal defense expenses. The amount by which a judgment or settlement (including legal defense expenses) exceeds \$35,000,000 is insured by a number of insurance and reinsurance carriers ("**Insurance Carriers**") subject to policy terms and conditions.

3. Because of the self-insured retention, there are no insurance policies directly relevant to the Alabama State Case¹ at this time. General Motors Company and the Debtor have not had any communications or meetings with any of the Insurance Carriers related to the Alabama State Case nor has the Debtor filed any claim or notice under any policy of insurance regarding the claims made by Hinrichs in the Alabama State Case.

4. No Insurance Carrier is providing coverage defenses related to the Alabama State Case at this time because payment by an Insurance Carrier insurance is not available at this time.

I declare under penalty of perjury that the foregoing is true and correct.

Executed On: September 3, 2009

¹ Unless otherwise noted, defined terms herein have the same meaning as defined terms in the Application of Federal Republic of Germany Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure.

By: Howard Chu
Howard Chu
General Motors Company
Claims Manager

